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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

RAUL SIQUEIROS, et al.,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

Case No.: 16-cv-07244-EMC

**GENERAL MOTORS LLC'S  
UNOPPOSED ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
GM'S SUR-REPLY IN OPPOSITION  
TO PLAINTIFFS' MOTIONS FOR  
ATTORNEYS' FEES AND  
SUPPORTING EXHIBITS**

Hon. Edward M. Chen

## **INTRODUCTION**

Pursuant to Civil Local Rule 79-5(c), General Motors LLC (“GM”) hereby submits this Administrative Motion to File Under Seal GM’s Sur-Reply in Opposition to Plaintiffs’ Motions for Attorneys’ Fees and Supporting Exhibits. GM’s counsel conferred with plaintiffs’ counsel on July 22, 2024. Plaintiffs do not oppose this motion.

GM seeks to file under seal all contents of Exhibits A-Q attached to GM’s Sur-Reply in Opposition to Plaintiffs’ Motions for Attorneys’ Fees. These exhibits contain excerpts from plaintiffs’ counsels’ previously sealed time and expense records, which plaintiffs previously moved to file under seal. ECF No. 673. In plaintiffs’ administrative motion to file their time and expense records under seal, plaintiffs explained that the information “reflects Plaintiffs’ counsels’ confidential work product and client communications and should be sealed,” that were it not sealed, “Plaintiffs’ counsel, as well as Plaintiffs in other pending litigations, will suffer irreparable injury because Plaintiffs’ counsels’ litigation strategies and work product will be revealed,” and that “there is no less restrictive alternative to sealing these records, as each entry would require redactions, preventing the Court and GM from seeing the actual entries.” (*Id.* at ii.) The Court granted Plaintiffs’ Administrative Motion to Seal and ordered that the documents would “remain confidentially filed under seal until further order of the Court, with publicly filed versions redacted.” ECF No. 690. GM’s present motion does not seek to file any additional material under seal, but rather to maintain the confidentiality previously afforded to this information by the Court.

GM further seeks to file a redacted version of its Sur-Reply in Opposition to Plaintiffs’ Motions for Attorneys’ Fees. GM specifically seeks to redact certain limited passages that directly quote from the sealed exhibits.

GM therefore conditionally lodges under seal its Sur-Reply in Opposition to Plaintiffs’ Motion for Attorneys’ Fees and all contents of Exhibits A-Q attached thereto. In support of this Motion, GM submits the Declaration of April N. Ross, which identifies the documents so lodged under seal.

1 DATED: July 22, 2024

Respectfully submitted,

2  
3 /s/ April N. Ross

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